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9                   Hoskins, Oxford Financial, LLC, Mowab, Inc., and  
10                  Dream Financial

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12                  **UNITED STATES DISTRICT COURT**  
13                  **FOR THE DISTRICT OF NEVADA**

14                  FEDERAL TRADE COMMISSION,

15                  Case No.: 2:11-cv-00283-JCM-GWF

16                  Plaintiff,  
17                  v.

18                  IVY CAPITAL, INC. et al.,

19                  Defendants, and

20                  CHERRYTREE HOLDINGS, LLC, et al.,

21                  Relief Defendants.

22                  **STIPULATION FOR EXTENSION OF**  
23                  **TIME FOR DEFENDANTS TO FILE**  
24                  **REPLY IN RESPONSE TO FTC'S**  
25                  **OPPOSITION TO MOTION FOR**  
26                  **RELIEF UNDER FRCP 60(b)**  
27                  **(FIRST REQUEST)**

28

29                  On June 15, 2021, the FTC filed its Opposition (Doc. #454) in response to the  
30 Defendants' Motion for Relief and/or Modification of Judgment and Order for  
31 Permanent Injunction and Monetary Relief (Doc. #449). The parties stipulated for the  
32 FTC to have a seven-day extension to file its Opposition, and the Court approved the  
33 extension (Doc. #452). Under LR 7-2(b), the Defendants' Reply in support of their Motion  
34 is currently due June 22, 2021.

35                  Counsel for Defendants has requested a three-day extension, through June 25, to  
36 file the Defendants' Reply brief, and counsel for the FTC has agreed to this extension.  
37 Pursuant to LR IA 6-1, this is the first stipulation for an extension of time to submit the  
38

1 Reply in response to the Opposition. This request is made to provide sufficient time for  
2 counsel to review the information presented in the Opposition and to prepare an  
3 appropriate response.

4 The parties and their counsel therefore stipulate that the Defendants shall have  
5 until June 25, 2021, to file a Reply in response to the FTC's Opposition and in support of  
6 their Motion for Relief. (Docs. #449 and 454.)

7

8 Date: June 21, 2021

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10 **KOCH & SCOW LLC**

11 /s/ David R. Koch

12 David R. Koch  
13 Attorneys for Benjamin E. Hoskins, Leanne Hoskins,  
14 Oxford Financial, LLC, Mowab, Inc. and  
15 Dream Financial

16 **FEDERAL TRADE COMMISSION**

17 /s/ P. Connell McNulty

18 P. Connell McNulty  
19 Attorneys for Federal Trade Commission

20 **IT IS SO ORDERED:**

21   
22 James C. Mahan

23 UNITED STATES DISTRICT JUDGE

24 DATED: June 23, 2021

**CERTIFICATE OF SERVICE**

I hereby certify that on May 25, 2021, I electronically filed the foregoing document with the Court using CM/ECF, which will send a notice of electronic filing to all counsel of record.

Dated: June 21, 2021

/s/ Andrea Eshenbaugh  
Andrea Eshenbaugh